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Counsel for Defendant
Peter Townsley

United States District Court
Northern District of California

UNITED STATES OF AMERICA

Plaintiff,

vs.

PETER TOWNSLEY,

Defendant.

No. CR 10-0428 CRB

STIPULATION AND ~~PROPOSED~~
ORDER TO VACATE BOND
STATUS HEARING BASED UPON
GOVERNMENT'S APPROVAL OF
THE COLLATERAL SECURING
THE BOND

Peter Townsley, through his counsel of record, and the United States, through its counsel of record, stipulate to the following:

1. The Court (Magistrate Judge Joseph Spero) previously set a bond status hearing in this matter to allow time for Mr. Townsley to post, and the government to review for its approval, the \$300,000 of equity in the property in Gonzalez, California needed to secure his bond. See, "Amended Order Re Bond And Terms And Conditions Of Release," Docket No. 10, p. 3.

2. The bond status hearing has been continued twice by order of the Court, upon the stipulation and request of the parties, and is currently set for January 7, 2011. Docket Nos. 19 & 21.

1 3. Mr. Townsley has provided the government with (a) a completed
2 appraisal of the Gonzalez property establishing that it has sufficient equity to
3 secure the bond; (b) proof that a lien against the property in Gonzalez, California
4 in the amount of \$300,000 in favor of the Clerk of the Court, Northern District of
5 California was recorded on November 10, 2010; and (c) a current title report.

6 4. The government has advised Mr. Townsley's counsel that the collateral is
7 acceptable and that it approves the bond as posted.

8 5. In light of the government's approval of the bond, the parties jointly
9 request that the Court vacate the hearing on the status regarding the posting of
10 the property that is currently set for January 7, 2011, at 10:30 a.m.

11
12 As counsel for Peter Townsley, I stipulate to paragraphs 1-5, *supra*.

13 Dated: December 30, 2010 Signed: /s/ William J. Genego

14
15 As counsel for the United States, I stipulate to paragraphs 1-5, *supra*.

16 Melinda Haag, United States Attorney

17 Dated: December 30, 2010 By: /s/ Susan Bowman
18 Assistant U.S. Attorney
19 (email authorization of 12/30/10)

20 The Court approves the stipulation and hereby ORDERS that:

21
22 The hearing on the status regarding the posting of the property that is
23 currently scheduled for January 7, 2011, at 10:30 a.m. is vacated.

24 IT IS SO ORDERED.

25 Dated: Jan. 4, 2011

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The Hon. Judge Joseph C. Spero
